
MIOSHA

General Industry Safety and Health Division (GISHD)
Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

DIVISION INSTRUCTION

DOCUMENT IDENTIFIER:

GISHD-COM-16-1R2

DATE:

June 9, 2021

SUBJECT: Tree Trimming Operations

- I. Purpose. This instruction establishes policies and procedures for inspections of tree trimming operations.
- II. Scope. This instruction applies division-wide.
- III. References.
 - A. General Industry Safety and Health Standard Part 53. /R408.15301 et seq., [Tree Trimming and Removal](#).
 - B. General Industry Safety and Health Standard Part 86. /R408.18601 et seq., [Electric Power Generation, Transmission, and Distribution](#).
 - C. Occupational Safety and Health Administration (OSHA) Memorandum, [Request for Interpretation of OSHA Standard 29 CFR 1910.269](#), April 26, 1999.
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; Internet Accessible; and MIOSHA Messenger.
- V. Cancellations. All previous versions of this division instruction.
- VI. Next Review Date. To be reviewed in three (3) years from date of issuance.
- VII. History. History of previous versions include:

GISHD-COM-16-1R1, February 15, 2017
GISHD-COM-16-1, July 7, 2016
GISHD-MEMO-ADM-07-3, June 22, 2007
- VIII. Contact. [Adrian Z. Rocskay](#), Division Director
- IX. Originator: Adrian Z. Rocskay
- X. Significant Change. Added OSHA memorandum [Request for Interpretation of OSHA Standard 29 CFR 1910.269](#) to the Reference section.
- XI. Application of [Part 53](#) and [Part 86](#) to Line-Clearance Tree-Trimming Operations.
 - A. The provisions of Part 86 (29 CFR 1910.269) applicable to line-clearance tree-trimming operations are as follows:
 1. 29 CFR 1910.269, except paragraph (r)(1), applies to line-clearance tree-trimming operations performed by qualified employees (those who are knowledgeable in the construction and operation of electric power generation, transmission, or distribution equipment involved, along with the associated hazards). These employees typically perform tree-trimming duties as an incidental part of their normal work activities.

2. Paragraphs 1910.269(a)(2), 1910.269(b), 1910.269(c), 1910.269(g), 1910.269(k), 1910.269(p), and 1910.269(r) of this section apply to line-clearance tree-trimming operations performed by line-clearance tree-trimmers who are not qualified employees. MIOSHA has adopted special electrical safety-related work practice provisions for line-clearance tree trimmers that are more stringent than those that apply to qualified employees.
 3. These provisions are contained in paragraph 1910.269(r)(1) and include certain minimum approach distances. Paragraphs 1910.269(a)(2), 1910.269(b), 1910.269(c), 1910.269(g), 1910.269(k), and 1910.269(p) are general requirements addressing training, medical services, first aid, job briefing, personal protective equipment (PPE), material handling, and mechanical equipment, respectively.
- B. The SO will use the following criteria to determine when [Part 53](#) or [Part 86](#) applies:
1. When a utility company employee is performing a line-clearance tree-trimming operation or if employees are working under contract for a utility company to perform a line-clearance tree-trimming operation, Part 86 will apply.
 2. When an employee is performing other types of tree-trimming activity such as tree removal or landscaping near power lines, Part 53, Rule 5321 will apply.

XII. Self-Initiated Inspections.

- A. A SO may self-initiate an inspection of a tree trimming operation after supervisory approval. The allowance for self-initiation is the SO observing a serious violation while in transit, or less typically, when conducting another inspection. The SO will:
1. Not compromise their own safety while driving in order to observe a tree trimming operation. Distracted driving is a leading cause of traffic accidents. When the SO sees a tree trimming operation that may be problematic, the SO will pull safely off the road and only scrutinize the operation once parked.
 2. Observe the tree trimming operation briefly, discreetly, and from a distance but in a location that offers a good view of the activities.
 3. If no serious violations are detected, move on. A list of serious hazards is provided below in section XI. B.
 4. If at least one serious violation is observed, attempt to photograph the violation from a distance.
 5. Call their supervisor to obtain permission to open the inspection. If the supervisor is unavailable, ask to speak to their manager, or any other

- available supervisor or manager. This may include pulling the supervisor or manager from a meeting due to the urgent nature of the request.
6. When permitted, proceed with opening an inspection after donning appropriate PPE, such as safety glasses, earplugs, high-visibility vest, and hardhat.
 7. Observe the roadway for hazards, activate and place your yellow flasher on your vehicle, and then safely approach the work area.
 8. Introduce himself/herself and explain the purpose of the inspection, (prevention of fatalities in tree trimming) and then conduct an opening conference.
 9. Inquire about the reason for the work being conducted. Limb or tree clearance for construction excludes general industry jurisdiction. Limb or tree clearance related to power line clearance will be covered under Part 86. All other tree trimming violations will be addressed under [Part 53](#).
 10. Send a short email notification to their supervisor by the end of the day indicating whether the inspection has been opened or not.
- B. The SO will observe for the following serious violations:
1. An employee lacking proper PPE, such as hard hats, safety glasses, and next to roadways, high-visibility vests.
 2. Missing or inadequate signs on the road warning approaching vehicles of the roadside tree-trimming operations ahead.
 3. An employee aloft in a tree without proper fall protection.
 4. An employee in the bucket of an aerial lift without fall protection or not anchored or tied off to the bucket.
 5. An employee working too close to electrical wires.
 6. An employee standing under, in the path of, or in close proximity to limb cutting, limb dropping, or tree felling.
 7. Inadequate guarding on the woodchipper.
 8. Any other violation of Part 53 that could result in a fatality – for example, a poor limb or tree felling procedure that could cause employee to fall from tree or employee to be struck by falling tree or limbs, electrical hazards, or a work practice that could result in an employee being pulled into the chipper.
- C. OSHA Information System Coding. The SO will code the inspection as “Unprogrammed Other” on the Inspection tab in the Inspection Type subtab in the Initiating Type field.

XIII. Other Considerations.

- A. If the SO is inspecting a county road commission, department of public works, or local park and recreation department, the SO will ask if there is any tree trimming being performed currently. If yes, the SO will go to the location to observe the operation.
- B. After a severe storm (ice, wind) or news reports of a lot of downed trees, the SO should be especially alert for tree trimming operations on the side of the road. To find tree trimming operations, a safety supervisor may assign an SO to travel through an area reported to have downed trees. Taking back roads rather than freeways is another way to encounter more of these operations.